

KARENE BROWN ATTORNEY AFFIRMATION:
ATTORNEY OF RECORD FOR F.G.M.

I, Karene Brown, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct to the best of my knowledge and belief:

1. My name is Karene Brown. I am a Staff Attorney at The Legal Aid Society within the New York Immigrant Family Unity Project (“NYIFUP”). I represent F.G.M. in his removal proceeding. I first entered my appearance in his immigration case on April 29, 2024.
2. On the evening of April 17, 2025, F.G.M. called me while detained at Bluebonnet Detention Center. F.G.M. has a pending asylum application and no final removal order.
3. F.G.M. said that ICE accused him of being Tren de Aragua gang member as well as provided documentation labeling him as such. ICE told F.G.M. to sign some papers that were written in English but F.G.M., who speaks only Spanish, refused. ICE informed F.G.M. that these papers were coming from the President, and that he will be deported even if he did not sign it.
4. An English-speaking Venezuelan man then came on the phones and read the notice that ICE provided to F.G.M. In the notice, it classified F.G.M. as a TdA gang member. It stated that he is an Alien Enemy, he was determined to be over 14 years old, and that he must be removed from the US. The English-speaking Venezuelan said that ICE had informed them that they will be deported either today or tomorrow to Venezuela.
5. F.G.M. said that he observed many Venezuelans signed the documents provided by ICE.

I, Karene Brown, affirm under penalty of perjury, that the foregoing is true and correct.

April 17, 2025
New York, NY

/s/
Karene Brown